

Donald S. Clark
2004
Secretary
Federal Trade Commission
Room H-159
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

May 3,

Privo Safe Harbor Proposal, Project No. P044506

Dear Mr. Clark:

I am pleased to offer support for the proposed "Safe Harbor" Guidelines submitted by Privo, Inc. (Privo) in response to the Federal Trade Commission (FTC) notice for comment. I believe that Privo's proposal fully adheres to, or exceeds, the provisions of the Children's Online Privacy Protection Act (COPPA) and should be approved as a Safe Harbor by the FTC.

My Background

I am a youth marketing expert who has spent many years in kids marketing, advertising, entertainment and research. My company, KidShop, consults for and provides communication solutions for a wide range of companies addressing kids 12 and under. I have also served on the Children's Advertising Review Unit (CARU) advisory board for many years, where among other key issues, I played an active role in drafting Internet advertising and privacy guidelines that were facilitative in the original drafting of COPPA.

Prior to forming KidShop, I was president of Griffin Bacal, a youth-dedicated advertising agency. While at Griffin Bacal, I led businesses in virtually every youth marketing product category. I also created an online research business, LiveWire: Today's Families Online™, a youth consulting business, Kid Think, Inc. and a trends consulting company, Trend Walk™.

The Privo Solution

I am intimate with the Privo's solution, and its industry promotion of adherence to COPPA, having served on Privo's Advisory Board since 2001. Also, as an independent consultant to Schwab Learning's award-winning Sparktop.org website, I witnessed the tremendous benefits of integrating Privo's solution from a client perspective first-hand.

Privacy protection and safety for children on the Internet is of paramount importance. The ability for

marketers to be able to directly communicate with parentally-permissioned young consumers is also vitally important in an business environment in which the Internet is such a powerful communications medium.

Privo is an important addition to Safe Harbor. The company is unique in its business model as a child registration and parental permission management service provider. In its Safe Harbor application, the company establishes its commitment to promote consumer respect, parental empowerment, and children's safety and privacy on the Internet.

Privo's model is especially helpful to parents, who benefit from a centralized service that can easily enable them to register and customize their children's website participation. Privo's user name and password system provides an easy method for parents to permission their children to participate with other Privo-enabled websites of interest to their child. With Privo, the parent is not burdened with verifying themselves to each company, but through PrivoLock registration, can easily permission their child to participate with other sites of choice.

Privo's commitment to, and investment in developing secure data-handling and management is a major advance in the industry in handling sensitive children's contact data. The Privo method provides greater privacy and security for children than internal company customer service departments. Privo has demonstrated leadership and expertise in the industry. Privo has presented its methodology and the need for children's privacy protection at numerous industry events both in the U.S. and Europe.

Summary

Privo is an elegant and efficient solution for companies who want to be COPPA-compliant in their online initiatives. Privo has the potential to emerge as a much needed standard in child registration and parental permissions management. Marketplace adoption of Privo will result in greater protections for children online and consumer empowerment in general.

For all of the reasons outlined in this letter, I enthusiastically encourage the FTC to approve Privo's application for Safe Harbor as submitted.

Sincerely yours,

Paul Kurnit

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